

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

THE NOCO COMPANY,	)	CASE NO. 1:20-cv-02322
	)	
Plaintiff,	)	JUDGE DAVID A. RUIZ
	)	
v.	)	
	)	
AUKEY TECHNOLOGY CO., LTD., et	)	
al.	)	
	)	
Defendants.	)	
	)	

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JOINT STATUS REPORT REGARDING READINESS OF CASE FOR RESUMING  
MEDIATION

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Pursuant to this Court's January 5, 2023, Order (Non-Document), Plaintiff The NOCO Company ("**NOCO**") and Defendants Aukey Technology Co., Ltd., ("**Aukey**"), Shenzhenshi Jiangyun Shangmaoyouxiangongsi ("**HuiMing**"), and Wodeshijikeji Shenzhen Youxiangongsi ("**WorldUS**" and with Aukey and HuiMing, the "**Defendants**") (collectively, the "**Parties**") provide the following joint status report as to the progress of discovery.

Since the Parties' January 4, 2023, Joint Status Report Regarding Readiness of Case for Resuming Mediation (ECF #43), the Parties have made progress in discovery. Defendants have provided Supplemental Responses to certain NOCO Interrogatories, proposed language for a stipulation clarifying the relationship between the Defendants (to eliminate

any need for separate discovery from each defendant), and have provided NOCO an initial set of proposed ESI search terms that the Parties are considering.

The Parties also finalized NOCO's ESI search terms for Aukey's documents. The third-party e-discovery vendor retained by Aukey has searched Aukey files using the agreed search terms and collected the documents with "hits." The several thousand documents collected from Aukey were then reviewed by a Chinese law firm (as required by Chinese law) to ensure that certain personal information and any potential state secrets were redacted before the documents were "produced" to litigation counsel outside of China. The redacted Aukey documents have just been made available to Aukey's litigation counsel, who have begun to review them for privilege and responsiveness.

With respect to NOCO's third-party discovery, NOCO's counsel received an initial production on February 15, 2023, which it shared with Defendants' counsel. This production consists solely of an Excel Spreadsheet created by Amazon which apparently provides certain information about communications between Amazon Sellers and Amazon regarding NOCO products. While the Parties have yet to substantively discuss the third-party production, the third-party production raises additional questions at the heart of this litigation related to NOCO's Browse Nodes. Likewise, NOCO has raised additional concerns related to the substance of the production with the producing third party.

Although the Parties are still preparing to produce documents and intend to depose witnesses, which likely necessitates an extension of the discovery deadlines, the Parties look forward to exploring a resolution at the April 25, 2023, mediation.

Respectfully submitted,

**ANALECTS LEGAL LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was filed electronically via the Court's electronic docketing system on March 15, 2023. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jon J. Pinney

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